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ORIGINAL

## BEFORE THE ARIZONA CORPORATION COMMISSION

DOUG LITTLE  
ChairmanBOB STUMP  
CommissionerBOB BURNS  
CommissionerTOM FORESE  
CommissionerANDY TOBIN  
Commissioner

Arizona Corporation Commission

DOCKETED

AUG 29 2016

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AZ CORP COMMISSION  
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IN THE MATTER OF THE  
APPLICATION OF EPCOR WATER  
ARIZONA INC. FOR A  
DETERMINATION OF THE CURRENT  
FAIR VALUE OF ITS UTILITY PLANT  
AND PROPERTY AND FOR  
INCREASES/DECREASES IN ITS  
RATES AND CHARGES BASED  
THEREON FOR UTILITY SERVICE BY  
ITS AGUA FRIA, ANTHEM, MOHAVE,  
SUN CITY, AND SUN CITY WEST  
WASTEWATER DISTRICTS AND FOR  
CONSIDERATION OF  
CONSOLIDATION AND DE-  
CONSOLIDATION PROPOSALS

Docket No. WS-01303A-16-0145

**RESPONSE TO STAFF'S  
MOTION FOR EXTENSION OF  
TIME**

Through this filing, EPCOR Water Arizona Inc. ("Company") responds to Staff's motion for an extension of time. The Company is sensitive to Staff's concerns about a potential conflict of interest which forms the basis for Staff's request. However, the Company wishes to clarify the facts surrounding this request. Also, for the reasons stated below, the Company believes that this request is premature.

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**Lewis Roca**  
**ROTHGERBER CHRISTIE**



revised schedule would also provide further opportunity for settlement discussions to commence prior to year-end. In the proposal below, the Company has also proposed to reduce the time for its rebuttal testimony (which is further reduced by the intervening holidays). Finally, this proposal would also limit the delay in the commencement of the hearing to two weeks.

	<b>Current Date</b>	<b>Staff Proposal</b>	<b>Company Proposal</b>
Staff and Intervenor Direct Testimony	November 16, 2016	December 14, 2016	December 9, 2016
Staff and Intervenor Rate Design	November 23, 2016	December 21, 2017	December 16, 2016
Company Rebuttal	December 16, 2016	January 13, 2017	January 9, 2017
Staff and Intervenor Surrebuttal	January 6, 2017	January 25, 2017	January 23, 2017
Company Rejoinder	January 16, 2017	February 3, 2017	January 30, 2017
Pre-Hearing Conference	January 19, 2017	February 7, 2017	February 3, 2017
Hearing Commences	January 23, 2017 <sup>1</sup>	February 13, 2017	February 6, 2017

## CONCLUSION

For the reasons set forth above, the Company respectfully requests that the Administrative Law Judge deny Staff's request for an extension as premature. In the alternative, the schedule proposed by the Company as set forth above should be adopted as a reasonable schedule for all parties to this proceeding. The Company further requests a procedural conference to address any continued disputes over this proposed extension.

<sup>1</sup> If any changes are made to the hearing date, the first day of hearing should remain for public comment purposes as noticed by the Company.

1 RESPECTFULLY SUBMITTED this 29th day of August, 2016.

2 LEWIS ROCA ROTHGERBER CHRISTIE, LLP

3  
4  
5 

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10 ORIGINAL AND thirteen (13) copies  
11 of the foregoing filed  
this 29th day of August, 2016, with:

12 The Arizona Corporation Commission  
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15 Copy of the foregoing hand-delivered  
16 this 29th day of August, 2016, to:

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19 Arizona Corporation Commission  
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20 Dwight Nodes  
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